IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

DONNA CURLING, et al.,))
Plaintiffs,)))
v.) Case No. 1:17-CV-02989-AT
BRAD RAFFENSPERGER, et al.,)))
Defendants.)))

NON-PARTY U.S. DOMINION, INC.'S MOTION FOR LEAVE TO FILE UNDER SEAL

Non-party U.S. Dominion, Inc. ("Dominion") hereby requests permission of the Court to file under seal the MITRE Corporation's National Election Security Lab ("MITRE NESL") Independent Technical Review: Georgia's ImageCast X Ballot Marking Devices (July 2022) (hereinafter, "MITRE Report"). In support of this Motion, Dominion shows as follows:

1.

Plaintiffs' expert, J. Alex Halderman, has made public statements referencing his opinions about the security of Dominion's voting machines. Subsequently, Plaintiffs, Plaintiffs' expert and others (including Dominion's customers) sought additional information about Dominion's voting machines from Dominion.

2.

In March of 2022, Dominion retained the MITRE Corporation's National Election Security Lab ("MITRE NESL") to perform an independent evaluation of the Plaintiffs' Report.

3.

MITRE NESL is a trusted authority on cybersecurity in the election space, and it provides election industry participants (including state, local, and federal officials) a means to maintain public trust and confidence in our election systems.

4.

MITRE NESL has completed its evaluation and provided a report to Dominion entitled Independent Technical Review: Georgia's ImageCast X Ballot Marking Devices (July 2022) (hereinafter, "MITRE Report").

5.

Dominion has filed the Executive Summary of the MITRE Report on the public docket and now seeks guidance from the Court on Dominion's obligations under the Court's Protective Order [Doc. 477] with respect to the full MITRE Report.

6.

Dominion does not believe releasing the full MITRE Report would contravene the Court's Protective Order in this case and seeks the Court's confirmation that it may release that full report to its current customers.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.
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CERTIFICATE OF COMPLIANCE <u>AND SERVICE</u>

I hereby certify that the foregoing as prepared using Times New Roman font, 14-point type, which is one of the font and point selections approved by the Court in L.R. 5.1(B). I further certify that I filed the within and foregoing *Non-Party U.S. Dominion, Inc.'s Motion for Leave to File Under Seal* using the CM/ECF system, which will automatically send notification of such filing to all counsel of record.

Respectfully submitted: September 19, 2022.

/s/ J. Matthew Maguire, Jr.
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